

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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RAYMOND LAMAR BROWN  
#48657  
54 W. Broad Street Bridgeton, NJ  
08302

JOHN CLARK #42595  
54 W. Broad Street Bridgeton, NJ  
08302

DESMOND RODGERS #87862  
54 W. Broad Street Bridgeton, NJ  
08302

CIVIL ACTION No. 1:20-cv-  
7907(NLH)(KMW)

TODD FORD, JR. #61921  
54 W. Broad Street Bridgeton, NJ  
08302

And Others Similarly Situated,

Plaintiffs,

v.

CHARLES WARREN, in his  
official capacity as Deputy Warden,  
Cumberland County Dep't.  
Corrections, and John Doe, Acting  
Warden, Cumberland County Dep't  
Corrections,

Defendants.

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**ORDER TO SHOW CAUSE SEEKING  
PRELIMINARY INJUNCTIVE RELIEF**

This matter having been opened to the Court on the order to show cause of Plaintiffs Raymond Lamar Brown, John Clark, Desmond Rogers and Todd Ford, Jr., individually and on behalf of simulated individuals incarcerated in the Cumberland County Jail (together “Plaintiffs”), by counsel, Fox Rothschild LLP, seeking relief based upon the facts set forth in the First Amended Complaint and in the Certifications of Plaintiffs;

It is on the 1st day of February, 2021 **ORDERED** that Defendants shall appear and show cause before the Honorable Noel L. Hillman, U.S.D.J. of the United States District Court, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey on the 24th day of February, 2021 at 10:00 a.m.<sup>1</sup> why an order should not be issued:

A. Appointing a monitor with unfettered access to: cell and dormitory units, common areas, medical units, quarantine units, confidential communications with detained individuals in and out of quarantine, confidential communications with the correctional officers and Cumberland Jail staff, and surveillance of public areas of the facility, and requiring the monitor to report on conditions within Cumberland Jail and to make recommendations to the Court

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<sup>1</sup> Consistent with the Standing Orders of the Court now in force during Phase III of the Court’s Reopening Plan, the Camden Courthouse is currently closed except for emergency proceedings. The Court will conduct this hearing using Zoom.gov videoconferencing and directs the parties to the Court’s Courtroom Deputy for details regarding the hearing.

consistent with CDC guidance on best practices to prevent the spread of COVID-19;

B. Requiring Defendants to immediately:

1. Provide every inmate with an N95 mask and provide access to replacement masks on both a regular and as needed basis;
2. Provide every inmate who requires other or additional personal protective equipment with such equipment, including face shields;
3. Require each inmate to wear a mask or at all times when in a common area;
4. Require that all correctional officers and other staff wear personal protective equipment, including masks and gloves, when interacting with inmates, other staff or individuals having access to the Cumberland Jail;
5. Implement measures to permit physical distancing;
6. Provide each inmate without cost, an individual supply of hand soap, sufficient to allow frequent hand washing; paper towels; toilet paper; running water; and facial tissue and access to hand sanitizer containing at least 60% alcohol;
7. Provide adequate cleaning supplies;

8. Conduct immediate COVID-19 testing for all inmates and staff, including correctional officers, and, on an ongoing basis, conduct COVID-19 testing of anyone displaying known symptoms of COVID-19 and who has come in contact with anyone testing positive for COVID-19;
9. Ensure that individuals identified as having COVID-19 or having been exposed to COVID-19 are properly quarantined in a non-punitive setting, with continued access to showers, recreation, mental health services, reading materials, commissary, phone and video visitation with loved ones, communication with counsel, and personal property; and
10. Provide proper nutrition; and

C. Granting such other relief as the Court deems equitable and just.

It is further **ORDERED** that

1. A copy of this Order to Show Cause, shall be served upon Defendants within 3 (three) days;
2. Defendants shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief by February 11, 2021; and

3. The Plaintiffs must file and serve any written reply to the Defendants' response to the Order to Show Cause opposition by February 18, 2021.

/s Noel. L Hillman  
HONORABLE NOEL L. HILLMAN, U.S.D.J.